

CALIFORNIA DATA PRIVACY NOTICE

1. PURPOSE OF THIS NOTICE

The purpose of this California Data Privacy Notice (“Notice”) is to inform you, as an agent or employee of Appreciation, LLC (“Appreciation”, “we” or “our”) about our practices regarding the collection, use, disclosure, transfer, and other processing of your work-related Personal Information (“Personal Information” or “PI”) of residents of the State of California during our independent agent registration process. This Notice also applies to you if you are a temporary worker, contingent worker or independent contractor, as well as to regular employees (although nothing in this Notice creates a relationship of employment between Appreciation and any temporary worker, contingent worker or independent contractor). Appreciation strives to process any PI fairly, in good faith and in accordance with applicable laws.

This Notice explains what kinds of PI we collect, how we collect it, why we collect it, what we use it for, how we may share it, and various other data handling practices we have at Appreciation. A general description of Appreciation data handling practices is set out in this Notice.

2. PURPOSES AND LEGAL GROUNDS FOR WHICH APPRECIATION WILL COLLECT AND USE YOUR PERSONAL INFORMATION

Appreciation will typically collect and use the PI it collects from you for the following legal grounds:

- The efficient and effective management of Appreciation’s workforce;
- Internal and external investigations or evaluations;
- Protection of Appreciation or third-party assets under Appreciation’s possession or control;
- The compliance with our legal obligations (e.g. our obligations to you as your employer under employment and health and safety legislation, and under statutory codes of practice, if applicable); and
- Presence of a legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. We may for example have a legitimate interest in business security and defending our (legal) interests.

The processing of your PI is based on legal requirements and business interests. In particular, we process data as necessary for our management of your employment and in order to administer payroll, improve and maintain the administration of employee benefits, facilitate the management of work and employees, establish career plans and paths, engage in recruiting, investigate any potential misconduct, operate and protect our IT and communications systems, and comply with record keeping and other legal obligations.

Appreciation may also process information relating to sensitive PI requiring higher levels of protection if and to the extent we are permitted to do so by law. Processing will typically be necessary for one of the following reasons:

- for carrying out obligations under employment law;
- for reasons of substantial public interest (e.g. equality of opportunity or treatment);
- for establishing, exercising or defending legal claims; or
- for the purposes of occupational medicine, or for assessing an employee’s working capacity.

We will notify you of any material changes to PI we collect or to the purposes for which we collect and process it.

3. THIRD PARTIES

We use third party service providers to process PI for many of Appreciation’s business functions. This includes collecting PI about you for the purposes described herein. Such service providers are limited, by contract, to process Personal Information for the purposes we specify. These service providers may not use PI for any purposes unrelated to the agreement we have with them, and they are required to maintain protections over PI consistent with the way Appreciation protects PI. Appreciation may collect PI about you from the following third parties:

- Background screening companies;

- Financial institutions;
- Government entities;
- Educational institutions;
- Healthcare providers;
- Insurance companies and administrators; and
- Publicly available government databases.

Appreciation does not sell PI to unaffiliated third parties as a general course of business. However, PI may be sold to a third party as part of a business transaction where some or all of the assets of Appreciation are acquired by a third party. Appreciation does not control third-party companies or their sites, and therefore is not responsible for their contents or the privacy policies or other practices of such companies or sites. Our inclusion of links to such sites, if applicable, does not imply any endorsement of the material on such websites or any association with their operators.

Further, it is up to you to take precautions to ensure that whatever links you select or software you download, whether from Appreciation's site or others, is free of such items as viruses, worms, trojan horses, defects, or other items of a destructive nature. These websites and services may have their own privacy policies, which you will be subject to upon linking to the third party's website. Appreciation strongly recommends that you review the third party's terms and policies.

4. RETENTION AND SECURITY

Appreciation will retain information about you for as long as necessary, both during and after the period of your employment, for the purposes for which it was collected, to defend or advance legal claims, or as otherwise required by applicable law.

We have in place appropriate security measures to prevent your PI from being accidentally lost or used or accessed in an unauthorized way. We limit access to your PI to those who have a genuine business need to know that information to provide services to you or to us, or in the course of conducting our normal business operations. Those processing your PI will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so in accordance with applicable timeframes.

5. YOUR RIGHTS

You may access and/or request a copy of your PI. From time to time, we will ask you to review and update your Personal Information to ensure its integrity for the purposes of ongoing data management.

You may review, update, or correct your PI through the back-office platform by making changes to your profile. You may also request the deletion, rectification or limitation of your PI or limitation of the processing activities as required by law. Furthermore, you may object to the processing of your PI where you are permitted by law to do so by use of the online tools Appreciation provides. These rights may be subject to legal restrictions as provided by applicable law. In the event that we do not accept your request for deletion, correction, rectification, or limitation of the processing activities, we will provide you with the legal basis for such rejection.

6. COOKIES AND SIMILAR TECHNOLOGIES

We and our partners use various technologies to collect and store information when you visit our site, and this may include using cookies or similar technologies to identify your browser or device. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our services.

We may use cookies to maintain continuity during a user session or to gather data about the usage of the website for research or other purposes. In some cases, we may also use another company to operate web servers or process credit card purchases for our websites.

7. DATA COLLECTED

Depending on when you registered with Appreciation, your data may have been collected in a different format. The data collected upon registration with Appreciation includes the following:

First Name; Last Name; Upline (name of agent above you in the hierarchy); Rank, i.e. MVP, RVP, AVP; Date of Birth; Social Security Number; Address, Including Street Address, City/State/Zip Code; Home Phone Number; Cellular Phone Number; Personal Email Address; Resident License State; Resident License Number; Resident License Expiration Date; Time Zone; Date Registered with Appreciation; Back Office Username; IP Address; Securities License Type (If Applicable); ACH Deposit Information, Account Type, Account Number, Routing Number, W-9 Information, Tax Classification, Paychex Number, Business Name (If Applicable); Background Information Questions (Questions Available Upon Request); and Criminal History Questionnaire (Questions Available Upon Request).

8. INFORMATION WE SHARE

We do not share PI with companies, organizations and individuals outside of Appreciation unless one of the following circumstances applies:

- **With your consent.** We will share PI with companies, organizations or individuals outside of Appreciation when we have your consent to do so, if applicable.
- **Owners.** We disclose PI and other data to Owners of Appreciation for the purposes described in this Privacy Notice, such as providing services, if applicable.
- **Authorized Licensees.** We disclose PI and other data to our Authorized Licensees for the purposes described in this Privacy Statement, such as providing and personalizing services and fulfilling requests.
- **For external processing.** We provide PI to our affiliates or other trusted businesses or partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties include payment processors, such as financial institutions and their vendors and contractors that process transactions, customer service, and other services. Financial transactions relating to registration may be handled by our payment services provider, *Stripe*. We will share transaction data with our payment services provider(s) only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds, if applicable. It is our policy to only share PI with contractors, service providers and other third parties who are bound by contractual obligations to keep PI confidential and use it only for the purposes for which we disclose it to them. Under certain circumstances, you may avoid having us share your information with our business partners and vendors by not granting us permission to share your information. Not granting us permission to share your information with our business partners or vendors may limit your access to their services through the Sites. We do not share PI data with third parties for their own marketing purposes.
- **For Legal Reasons.** We will share PI with companies, organizations or individuals outside of Appreciation if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
 - Meet any applicable law, regulation, legal process, or enforceable governmental request.
 - Enforce applicable Terms of Use, including investigation of potential violations.
 - Detect, prevent, or otherwise address fraud, security, or technical issues.
 - Protect against harm to the rights, property, or safety of Appreciation, our employees, agents, or the public as required or permitted by law.

We attempt to notify agents about legal demands for their PI when appropriate in our judgment, unless prohibited by law or court order or when the requires is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague, or lack proper authority, but we do not promise to challenge every demand.

- **Business Transfers.** If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, PI about our users is often a transferred business asset. In the event that Appreciation itself or substantially all of our assets are acquired, PI about our **users** may be one of the transferred assets.

- **Aggregate Site Information.** We may share aggregate and anonymized/pseudonymized PI to third parties in order to promote or describe use of the Sites, for research, marketing, advertising, or similar purposes.

9. CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Notice at any time and from time to time. This Notice is not intended to and does not create any contractual or other legal right in or on behalf of any party.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit <https://oag.ca.gov/privacy/privacy-laws>.